

### **REMARKS**

The Examiner has rejected claims 1-17 under 35 USC 103. The claims have been amended to further clarify the subject matter regarded as the invention. Claim 10 has been cancelled. Claims 1-9 and 11-17 remain pending.

#### ***Rejections Under 35 USC 103***

The claims have been rejected under 35 USC 103 as being unpatentable over Povilus, US Patent No. 5,740,425 ('Povilus' hereinafter) in view of Koga, US Publication No. US 2001/0027350 A1 ('Koga' hereinafter). The rejection is respectfully traversed.

As stated previously, Applicant respectfully asserts that the claims are allowable over the cited art. Povilus discloses a data structure for publishing electronic and printed catalogs. See title. This data structure is based upon a class structure as represented by the blocks referred to by the Examiner. See col. 13, line 60 – col. 14, line 23.

The Examiner cites col. 14, lines 57-67 and col. 54, lines 46-66 of Povilus. However, Povilus fails to include potential values or units in the data structure. In fact, FIG. 19 of Povilus is a table corresponding to an exemplary SKU table. As shown in this exemplary table, blanks are shown for each name, etc. In other words, possible selections for each item are not presented. Specifically, values (e.g., 10, 20, 40) and/or units (e.g., Hz, MHz) are not provided in the data structure. In other words, a user entering data in the table of Povilus must know the appropriate values and associated units permissible for a particular product. For instance, a user must know that a particular computer is available in only 25 GHz, rather than being able to select the values from a permissible list. As such, the system of Povilus is more susceptible to user error, and fails to provide benefits of the presently claimed invention. However, Povilus neither discloses nor suggests providing values and/or units in the data structure to enable selection of those values and/or units upon product classification. As a result, Povilus teaches away from providing a possible value list or a possible unit list in the data structure, as recited in the pending claims.

Applicant now refers to the use of Koga as a prior art reference. Applicant recognizes that publications may be used as prior art under a § 102(e). However, the

filing date that is relevant is the U.S. or International filing date. Koga's U.S. filing date is March 27, 2001, which is after the U.S. filing date of Applicant's application filed on July 26, 2000. While Koga's U.S. application claims priority to a Japanese application filed on March 28, 2000, this foreign priority date cannot be used for purposes of establishing an effective date of a prior art reference cited against an Applicant. In other words, the U.S. application does not claim priority to a PCT application, but to a Japanese application that cannot serve as the basis for priority under §102(e). Foreign priority claims cannot be considered under §102(e). Accordingly, Applicant respectfully submits that Koga cannot be cited as a prior art reference in the instant case.

Even if Koga's effective date was prior to the filing date of Applicant's application, Koga fails to cure the deficiencies of the primary reference. Koga discloses a manufacturing management system and method. See title. The Examiner asserts that Koga teaches a product being classified according to a data model, citing paragraph [0070]. Koga discloses inputting failure data for the purpose of analysis. See para. [0068].

Paragraph [0070] discloses that "The causes for failures are inputted to the database 32 after being corrected. Then, there are produced two data cubes, i.e., one data cube (phenomenon data cube) in which failures occur and the other data cube (cause data cube) in which the failures are corrected. After these data cubes are produced, the cubes can be selected on a screen. For example, there are set types of analyses such as line type, shift type, process type, data classification of model, classification of failure, failure period, the contents of analyses based on transition of pass rate, actual analysis, or palate analysis, or analysis of association between phenomena and causes. Thus, while Koga generally discloses "data classification of model," Koga fails to disclose or suggest a data structure such as that claimed for use in classifying a product.

Claim 1 recites a data structure for use in collecting, distributing or storing product data. Claim 1, as amended, further recites "a plurality of possible value lists, each possible value list being arranged to identify values that are selectable as values for an associated one of the attributes for a product being classified according to the data model." In no manner does the data structure of Povilus disclose or suggest a possible value list that identifies values that are selectable as values for the associated attribute corresponding to a product being classified according to the data model.

Similarly, Povilus fails to disclose or suggest a plurality of possible unit lists, each possible unit list being arranged to identify units that are selectable as units for an associated one of the attributes for the product being classified according to the data model. Accordingly, Applicant respectfully asserts that the independent claim 1 is allowable over the cited art.

Claim 2 depends from claim 1, and further recites “a plurality of possible unit lists, each possible unit list being arranged to identify units that are selectable as units for an associated one of the attributes for the product being classified according to the data model.” Neither of the cited references, separately or in combination, discloses or suggests a plurality of possible unit lists, as claimed. In fact, Povilus teaches away from providing possible unit lists in the data structure, as set forth above. As such, Applicant respectfully asserts that claim 2 is patentable over the cited art.

Claim 3 depends from claim 2, and further recites “each one of the values in the possible value list is combined with each one of the units in the associated possible unit list for one of the attributes to create a possible value-unit combination, and wherein each possible value-unit combination is assigned a normalized value.” Neither of the cited references discloses or suggests the invention of claim 3. The Examiner cites col. 19, lines 15-27, which merely refers to a “normalized base SKU table,” but indicates nothing about a possible value or possible unit list in the data structure. Accordingly, Applicant respectfully submits that claim 3 is patentable over the cited art.

Claim 4 depends from claim 1, and further recites that “each attribute is associated with a multi-value indicator that indicates that more than one of the values in the associated possible value list are selectable as values for the associated attribute for a product being classified according to the data model when the multi-value indicator is in a predefined state.” The Examiner cites col. 19, lines 15-27, which states nothing about a multi-value indicator that indicates that more than one of the values in an associated possible value list are selectable as values for the associated attribute for a product being classified according to the data model. As such, Applicant respectfully submits that claim 4 is patentable over the cited art.

With respect to claim 5, Povilus fails to disclose or suggest that “each of the attributes is associated with a data capture priority indicator that assigns priorities to at least some of the one or more attributes for capture of product data for the attributes in accordance with the assigned priorities” as recited in claim 5.” The Examiner cites

col. 14, lines 64, which states nothing about priorities or priorities for capture of product data attributes. Rather, Povilus merely discloses inheritance of class attributes. Accordingly, Applicant respectfully submits that claim 5 is patentable over the cited art.

Moreover, with respect to claim 6, Povilus fails to disclose or suggest “a possible countries table specifying one or more countries that are selectable as countries for which a product being classified according to the data model is adapted for sale.” Rather, Povilus merely discloses a table with “custom columns.” In fact, the Examiner admits that “Povilus’ table clearly has placeholders for variable information (i.e., countries).” As such, the data structure of Povilus fails to specify countries that can be selected when a product is classified according to the data model. While tables are known in the art, Povilus neither discloses nor suggests a possible countries table as claimed. Nowhere does Povilus mention a table of countries or the selection of value(s) from such a table in association with a product being classified according to the data model. In fact, in accordance with the Examiner’s admission that the table merely has placeholders rather than specified countries that can be selected, Povilus teaches away from the present invention. In other words, Povilus appears to suggest that values are inserted into the table manually since information must ultimately be filled into these “custom columns,” rather than selected from one or more countries specified in a table within a data structure, as claimed. Moreover, in no manner does Povilus disclose or suggest specifying one or more countries for which a product classified according to the data model is adapted for sale. Accordingly, Applicant respectfully submits that claim 6 is patentable over the cited art.

Claim 8 recites, in relevant part, “an attribute table in which selected attributes for each of the products are stored, each of the selected attributes being identified by the ~~corresponding~~ system SKU corresponding to the product classified according to the data model and having at least one of the values from ~~in~~ the associated possible value list.” Povilus fails to disclose or suggest storing one or more values from a possible value list in such an attribute table for products classified according to a data model as claimed.

In addition, claim 8, as amended, further recites “a customer mapping table that maps each system SKU to a customer SKU assigned to the corresponding product by a particular customer to which product data associated with the product is to be

provided, the customer being a retailer, reseller, manufacturer, or distributor that has requested the product data.” Neither of the cited references, separately or in combination, discloses such a mapping to enable product data to be provided to a customer (retailer, reseller, manufacturer, or distributor) that has requested the product data. Accordingly, Applicant respectfully submits that claim 8 is allowable over the cited art.

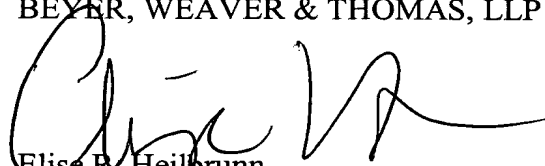
The dependent claims depend from one of allowable claims 1 and 8, and are therefore allowable as well. In addition, the dependent claims each recite additional limitations that are not further discussed. Accordingly, Applicant respectfully submits that the dependent claims are allowable for at least the same reasons.

**Conclusion**

The Applicants respectfully maintain that all pending claims are in condition for allowance. Therefore, Applicants respectfully request a Notice of Allowance for this Application from the Examiner. Should any unresolved issues remain, the Examiner is encouraged to contact the undersigned at the telephone number provided below.

Respectfully submitted,

BEYER, WEAVER & THOMAS, LLP



Elise R. Heilbrunn  
Reg. No. 42,649

P.O. Box 778  
Berkeley, CA 94704-0778  
Telephone: (510) 843-6200